

Appendix L
RESPONSES TO COMMENTS

Part 1 of 2

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API – Cameron LNG LLC / Cameron Interstate Pipeline LLC

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Cameron LNG LLC
AN AFFILIATE OF SEMPRALNG



JD Morris
Director, Permitting & Compliance
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February 20, 2014

Ms. Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

**Re: Cameron LNG, LLC - Docket No. CP13-25-000
Cameron Interstate Pipeline, LLC - Docket No. CP13-27-000
Response to DEIS**

On January 10, 2014 the Commission issued a draft Environmental Impact Statement (DEIS) for the Cameron LNG, LLC ("Cameron LNG") Liquefaction Project and the Cameron Interstate Pipeline, LLC ("Cameron Pipeline") Expansion Project. Cameron LNG and Cameron Pipeline (collectively "Cameron") are providing comments to the DEIS, responding to certain DEIS Recommended Mitigation Measures, and providing updated materials. In the DEIS, the Commission requested Cameron to provide a response to Recommended Mitigation Measure Nos. 18, 23, and 30, prior to the end of the public comment period.

The following information is enclosed.

- | | |
|--------------|--|
| Attachment 1 | Includes a complete response to DEIS Recommended Mitigation Measure Nos. 18, 23, and 30. |
| Attachment 2 | Includes a letter report referenced in the above response to Recommended Mitigation Measure No. 30. |
| Attachment 3 | Includes a copy of U.S. Army Corps of Engineers Permit MVN-2002-03266-WII received on February 12, 2014. |
| Attachment 4 | Includes a response to the letter (dated January 30, 2014) that National Marine Fisheries submitted to the Commission. |

API-1

AP1-1: Comment acknowledged. The EIS has been updated to reflect this information.

API – Cameron LNG LLC / Cameron Interstate Pipeline LLC

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Cameron LNG, LLC - Docket CP13-25-000
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Cameron also submits the following comments on the DEIS.

1. Several sections of the DEIS indicate Cameron LNG has purchased the land required for the Liquefaction Project as well as the adjacent residence. Although Cameron LNG has executed option agreements to purchase these properties, Cameron LNG has not yet acquired the property. Similarly, Cameron Pipeline has not yet purchased the property for the proposed Holbrook Compressor Station but has executed an option agreement to acquire the property prior to construction.
2. The project construction schedule stated in several locations in the DEIS has changed slightly as follows:
 - a. Construction of the Cameron Pipeline Expansion will begin in late 2014 with an expected in service date in 2017. Construction will begin with the Holbrook Compressor Station followed by the pipeline construction, with a total construction duration of approximately 24 to 32 months.
 - b. Construction of the Cameron LNG Liquefaction Project will begin in late 2014 with first LNG production scheduled for late 2017 and all three trains expected to come on line throughout 2018. The first full year of LNG production is expected in 2019.
3. Section 1.2.4 should be clarified as follows. "Cameron LNG seeks to export LNG from the expanded Cameron LNG Terminal to any country (1) with which the United States has, or in the future may have, a free trade agreement requiring national treatment for trade in natural gas; (2) with which the United States does not have a free trade agreement requiring the national treatment for trade in natural gas and LNG; (3) that has, or in the future develops, the capacity to import LNG; and (4) with which trade is not prohibited by United States law or policy.
4. In Section 2.2.1, the first bullet under the existing major equipment for the LNG Terminal should be corrected to state "*and four arms (including two liquid unloading arms, one vapor return arm, and one hybrid arm).*"
5. Cameron LNG would like to clarify a statement made in Section 4.12.5.3, in the first paragraph under the heading "Vapor Dispersion Analyses for Other Hazardous Fluids". The paragraph currently states "*Cameron LNG stated that methane was considered as a single component for the MFL flammable vapor dispersion analysis, and ethylene was chosen as input for the overpressure analysis due to its higher reactivity.*" Cameron LNG believes this statement was taken out of context from Attachment 2 of Cameron LNG's June 3, 2013 submittal (Exponent's May 31, 2013 Report). Cameron LNG was asked to explain why methane was not considered for the mixed refrigerant vapor dispersion analysis. In Cameron LNG's response, the Exponent report responded by stating "Methane was considered as a single-component analogue for the mixed refrigerant vapor dispersion analysis discussed in Request #1." Although, methane was considered, ethylene was also considered and

API-2

API-2: The final EIS has been revised to state that Cameron has option agreements for these properties.

API-3

API-3: The schedule for the Project has been revised throughout the final EIS.

API-4

API-4: Section 1.2.4 of the final EIS has been revised to include this statement.

API-5

API-5: The text of the first bullet in Section 2.2.1 has been revised in the final EIS to more accurately describe the existing types of loading, unloading, vapor return, and hybrid arms.

API-6

API-6: The EIS has been revised to clarify this issue.

API – Cameron LNG LLC / Cameron Interstate Pipeline LLC

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API-6
(cont)

was actually used as the single component input to PHAST. It should also be noted that the results using ethylene were more conservative than those obtained in the DEIS using the richest MRL composition.

Please contact me if you have any questions related to this request. Thank you for your attention to these matters.

Respectfully submitted,

/s/ JD Morris

JD Morris

Director, Permitting & Compliance

cc: Bill Rapp
Bill Lansinger

Attachments

API – Cameron LNG LLC / Cameron Interstate Pipeline LLC

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ATTACHMENT I

Response to DEIS
Recommended Mitigation Measure Nos. 18, 23, & 30

February 2014

RESPONSE TO DEIS
RECOMMENDED MITIGATION MEASURE Nos. 18, 23, & 30

Recommended Mitigation Measure No. 18

Prior to the end of the draft EIS comment period, Cameron Interstate shall provide an assessment of the feasibility of a reduced construction right-of-way width, expansion of nearby HDDs, or other alternative construction methods to minimize impacts on PFO wetlands containing bottomland hardwood species at MP 1.55, MP 2.25, MP 15.98, MP18.46, MP 18.79, MP 20.11, and MP 20.36. (section 4.4.5.2)

Response:

Cameron Interstate Pipeline (Cameron Pipeline) has reviewed the areas described in Mitigation Measure No. 18 and has prepared the following assessment to minimize the impact on PFO wetlands containing bottomland hardwood species. Cameron Pipeline utilized the photo based alignment sheets (Figure 1.9-3) and the corresponding wetland delineation report (Appendix B.2) from the Application to review the wetlands at the locations described above.

- At MP 1.55 & MP 2.25 – these locations correspond to station # 81+84, wetland WL-15 and station # 118+80, wetland WL-26 respectively, and according to the field data derived from the wetland delineation report are bottomland hardwood PFO wetlands. To minimize wetland impacts on wetlands associated with MP 1.55 & MP 2.25 Cameron Pipeline will reduce the footprint of the project area from 125' down to 100' within these areas. WL-15 is located in additional temporary workspace (ATWS) associated with Koonce Road and WL-26 is associated with ATWS for the pullback section of the Houston River crossing HDD. This change results in a 0.14 acre reduction in impacts to the PFO wetlands at this location.

- At MP 15.98 – this corresponds to station # 843+74, wetland WL-108/109 and according to the field data derived from the wetland delineation report are PFO wetlands associated with pine plantations with some bottomland hardwood species located in the drainage areas. Although these wetlands are considered low quality based on the wetland delineation report and the Modified Charleston Method (MCM) wetland assessment used in the wetland permit application, Cameron Pipeline will reduce the ROW width in these areas from 100' to 75'

API-7

API-7: The relevant text and tables of the EIS have been revised to include information on the reduced widths of the construction right-of-way described in the comment by Cameron Interstate and to address the potential effects of the changes. In addition, Recommended Mitigation Measure No. 18 has been deleted from the EIS.

API – Cameron LNG LLC / Cameron Interstate Pipeline LLC

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API-7 (cont)

wide. This change results in a 0.1 acre reduction in impacts to the PFO wetland at this location.

- At MP 18.46 & 18.79 – these locations corresponds to station # 974+69, wetlands WL-117 and station # 992+11, wetlands WL-118/119 respectively, and according to the field data derived from the wetland delineation report are PFO wetlands associated with pine plantations with some bottomland hardwood species mixed in. Although these wetlands are considered low quality based on the wetland delineation report and MCM wetland assessment used in the wetland permit application, Cameron Pipeline will reduce the ROW width in these areas from 100' to 75' wide. This change results in a 0.87 acre reduction in impacts to the PFO wetlands at this location.
- At MP 20.11 & MP 20.36 – these locations correspond to station # 1061+81, wetland WL-120/121 and station # 1075+01, wetland WL-124 respectively, and according to the field data derived from the wetland delineation report, these wetland areas are considered low quality based on the MCM wetland assessment conducted for the wetland permit application. Even though these are low quality wetlands, Cameron Pipeline will reduce the ROW width in these areas from 100' to 75' wide. This change results in a 0.14 acre reduction in impacts to the PFO wetlands at this location.

All of the reductions in PFO wetlands described above are reductions to temporary wetland impacts and amount to a total of 1.25 acres, (1.11 acres of pipeline ROW, and 0.14 acres of ATWS). Considering these wetland reductions have not been approved by the FERC, these reductions are not reflected in Cameron's comments to Table 4.4.5-1 (Wetlands Affected by the Pipeline Expansion) in the DEIS.

The photo based alignment sheets will be updated prior to construction to reflect these changes and will be included in the Implementation Plan.

API-8: In addition to revising the text to report the reductions in the acreages of wetlands affected, we have revised Table 4.4.5-1.

API-9: Comment acknowledged.

Response Provided By:

Name: Michael Taylor / JD Morris
Affiliation: Semptra Global / Semptra Global
Phone: 281-630-2187 / 713-298-5479

February 2014

RESPONSE TO DEIS
RECOMMENDED MITIGATION MEASURE Nos. 18, 23, & 30

Recommended Mitigation Measure No. 23

Prior to the end of the draft EIS comment period, Cameron LNG shall file with the Secretary a plan to install and maintain vegetative screening between LA-27 and the vapor fence to disrupt views of the vapor fence and limit the visual impacts on users of LA-27 in the vicinity of the Terminal Expansion site. (section 4.8.5.1)

Response:

The amount of vapor fence required by the project and particularly along Louisiana State Highway 27 (LA-27) has been substantially reduced. This reduction is further described and explained in the response to Recommended Mitigation Measure No. 30. Originally, approximately 9,000 linear feet of vapor fence was proposed along LA-27, extending from the southern edge of the existing Terminal to the northern edge of the proposed facilities. After further analysis, over 80% of the fencing has been eliminated with only approximately 1,500 linear feet remaining. All of the vapor fencing currently proposed will be located adjacent to the existing Terminal facilities, where the viewshed from LA-27 is dominated by the existing LNG storage tanks.

API-10

For the following reasons, Cameron LNG is proposing to construct aesthetically pleasing vapor fence, similar to the concrete sound barriers used along highways near residential areas, rather than installing vegetative screening between the vapor fence and LA-27.

- The visual effect of the vapor fence will be largely reduced by the removal of over 80% of the vapor fence along the highway.
- The visual effect will be further reduced by the fact that all fencing proposed will be located adjacent to existing Terminal facilities, where the viewshed from LA-27 is dominated by the existing LNG storage tanks.
- Cameron LNG does not want trees, shrubs, or other combustible vegetation planted within the Terminal. Any vegetative screening would have to be installed at the base of the storm surge barrier which could interfere with security fencing and/or surveillance. In addition, it would be difficult to install and maintain

AP1-10: The text and graphics of the EIS have been revised to identify the location of the vapor fence provided by Cameron LNG in the comment. In addition, Recommended Mitigation Measure No. 23 has been deleted from the EIS.

API – Cameron LNG LLC / Cameron Interstate Pipeline LLC

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API-10
(cont)

effective vegetative screening between LA-27 and the vapor fence due to the low elevation in this area that is tidally influenced. This environment generally supports scrub/shrub or marsh vegetation which would have limited use as screening. This is further compounded by the fact the Terminal's storm surge barrier is elevated and is 9 ft higher than the area adjacent to LA-27.

Response Provided By:

Name: Ron Hand / JD Morris
Affiliation: Sempra LNG / Sempra Global
Phone: 713-884-6986 / 713-298-5479

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**RESPONSE TO DEIS
RECOMMENDED MITIGATION MEASURE Nos. 18, 23, & 30**

Recommended Mitigation Measure No. 30

Prior to the end of the draft EIS comment period, Cameron LNG shall file with the Secretary the revised location of the vapor fences corresponding to the most recent facility plot plan to show that the vapor fences do not obstruct the trucking route. Cameron LNG shall also revise the modeling analysis as necessary. (section 4.12.5)

Response:

As part of its response to Recommend Mitigation Measure No. 30, Cameron LNG has reviewed the vapor fence locations as originally proposed in the December 7, 2012 application. Due to the extensive time required for CFD modeling and it being critical path in the early project execution schedule, Cameron LNG utilized a very conservative approach during the FEED and FERC application phase of the project. This conservative approach was used in locating vapor fencing to assure a successful and timely CFD modeling outcome. Consequently, the amount of vapor fencing proposed in the application was overly extensive.

Cameron LNG requested Exponent, Inc. (Exponent) to review the originally proposed vapor fencing and determine what portion could be removed based on the past vapor cloud dispersion modeling results. It should be noted that this review dealt solely with information previously reviewed by FERC and included no new release scenarios or vapor dispersion modeling. Exponent summarized the results of their review in a letter report dated January 29, 2014 which is provided in Attachment 2.

Since vapor fences have no impact on the results of PHAST modeling, the Exponent report focused solely on the past CFD modeling completed for the Project. Exponent consolidated all of the CFD modeling results into a single drawing showing the plot plan and original vapor fence layout. This is shown as Figures 3 and 4 in the Exponent report. Figures 4 is a close up view of only the southern portion of the site. As further described in the Exponent report, the only vapor fencing required for the Project is that shown by the solid blue line on Figure 4.

API-11

API-11: The text and graphics of the EIS have been revised to identify the location of the vapor fence provided by Cameron LNG in the comment, including descriptions of the changes made to avoid concerns with internal road crossings. In addition, Recommended Mitigation Measure No. 30 has been deleted from the EIS.

February 2014

API – Cameron LNG LLC / Cameron Interstate Pipeline LLC

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Figure 1 below summarizes the findings from the Exponents report by depicting the overall plot plan with the required vapor fence shown by the black line. The dashed green and black line shows the location of the vapor fence that is no longer required.

The remaining or required vapor fencing only crosses two roads within the existing Terminal, as shown by the two orange dots on Figure 4. These two road crossings are described below.

- North Terminal Entrance Road Crossing – This entrance to the existing Terminal is used very infrequently (once or twice a year) for make-up refrigerant or special circumstances. When used the gate is opened by security personnel and guarded while the vehicle enters or exits. The gate is only kept open the minimum of time for the transit to occur and is guarded during the entire time it is open.
- Entergy Substation Entrance Road Crossing – This entrance is only used by Entergy personnel who use it to gain access into the existing Entergy substation approximately once a week. Cameron LNG security personnel are made aware of these visits and the gate is under security surveillance. This entrance does not provide access to the Terminal.

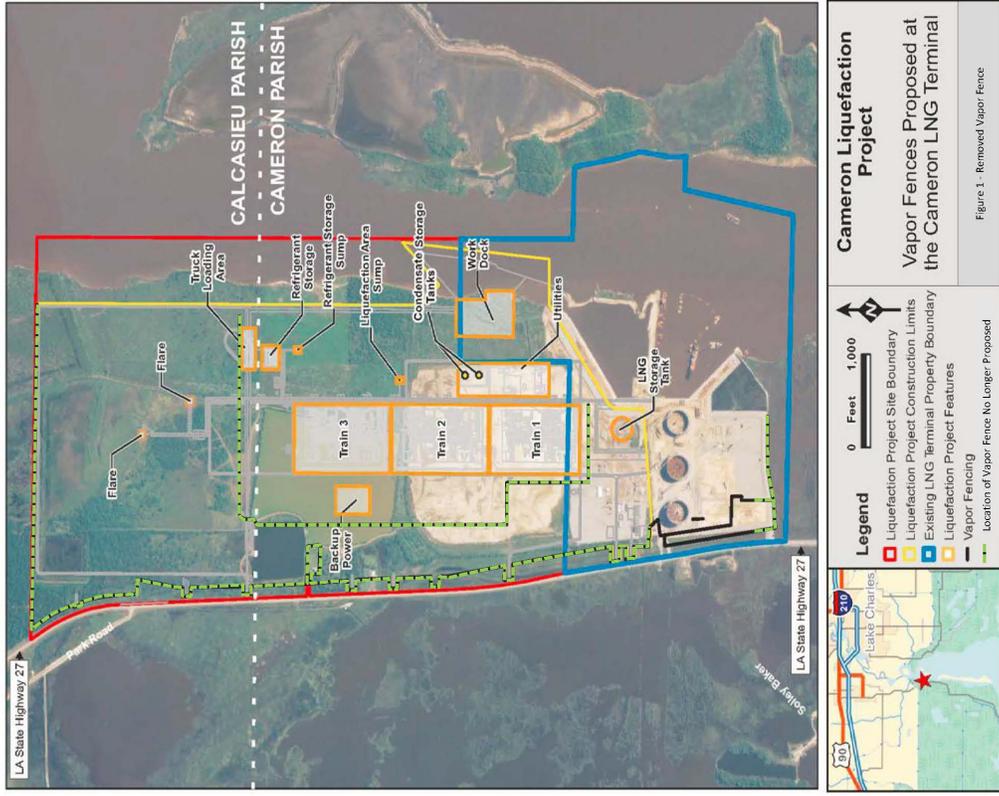
During construction of the vapor fencing, Cameron LNG will install gates in the vapor fencing at these two locations that will allow access under the same circumstances as described above. The gates would be opened and closed immediately before and after each vehicle use. The gates will be designed with the same vapor barrier characteristics as the vapor barrier fencing, i.e. same height, porosity, wind load, etc. The final design of the gates will be provided along with the final design of the vapor fencing prior to construction.

Response Provided By:

Name: JD Morris
Affiliation: Sempra Global
Phone: 713-298-5479

February 2014

API-11
(cont)



AP1 – Cameron LNG LLC / Cameron Interstate Pipeline LLC

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Cameron Interstate Pipeline, LLC – Docket CP13-27-000

AP1-12

ATTACHMENT 2

Exponent Letter Report
Dated January 29, 2014

AP1-12: The Exponent Letter Report is available in the full comment letter presented in Docket No. CP13-25-000, Accession No. 20140220-5191.

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AP1 – Cameron LNG LLC / Cameron Interstate Pipeline LLC

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Cameron Interstate Pipeline, LLC – Docket CP13-27-000

ATTACHMENT 3

AP1-13

U.S. Army Corps of Engineers
Permit MVN-2002-03266-WII

AP1-13: The Department of the Army permit issued to Cameron LNG is provided in Appendix K of this EIS.

API – Cameron LNG LLC / Cameron Interstate Pipeline LLC

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Cameron LNG, LLC - Docket CP13-25-000
Cameron Interstate Pipeline, LLC – Docket CP13-27-000

ATTACHMENT 4

Response to

National Marine Fisheries Letter dated January 30, 2014

API – Cameron LNG LLC / Cameron Interstate Pipeline LLC

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Cameron LNG, LLC - Docket CP13-25-000
Cameron Interstate Pipeline, LLC - Docket CP13-27-000

Response to National Marine Fisheries Letter dated January 30, 2014

Cameron LNG's Response

Cameron LNG has proposed permittee responsible compensatory mitigation to create tidal brackish marsh wetland habitat adjacent to the Project site (west of LA-27) at a ratio of 1.2 acres of created marsh for each acre of wetland impacted by the Terminal Expansion. Cameron LNG would beneficially reuse dredged material from the initial construction of the work dock and maintenance dredge material to convert approximately 255 acres of open water area to brackish marsh habitat. Cameron LNG has received a coastal use permit (CUP P20121194) from the LDNR Office of Coastal Management which includes an approved mitigation plan for the Project. Cameron LNG also has a CUP for maintenance dredging (CUP P20100398) of the existing terminal berth. This maintenance dredge permit has recently been modified and reissued to include maintenance dredging of the work dock. The proposed mitigation area will be adjacent to the marsh habitat previously created during maintenance dredging of the existing LNG terminal, thus contributing to a larger area of contiguous marsh habitat. It is anticipated that the mitigation project will be completed within approximately 24 months of Project initiation.

API-14

AP1-14: Comment acknowledged. See responses to comments FG3-1 and FG3-3 (Comment letter FG-3 from National Marine Fisheries Service dated January 30, 2014.)

In their letter to the Commission, the National Marine Fisheries Service (NMFS) requested that certain information related to the beneficial use of the dredge material and mitigation plan be included in the DEIS. The NMFS also requested the mitigation plan be updated to reflect the latest U.S. Army Corps of Engineers (COE) jurisdictional determination and mitigation requirements. Cameron LNG received a revised coastal use permit (CUP P20121194) on January 21, 2014 and a COE permit (MVN-2002-03266-WID) on February 12, 2014 for the Liquefaction Project. Both of these permits reflect the updated wetland impacts and mitigation requirements, and include the specific information requested by the NMFS pertaining to the beneficial use of the dredge material and mitigation plan. This information is summarized below.

In accordance with the CUP, COE Permit and mitigation plan, the dredge material will be placed at an initial fill height such that the settled fill height will not exceed +2.0 ft NAVD88 and be as close to surrounding natural marsh elevations as possible. Dredge material from initial construction of the dock as well as maintenance dredge material from the existing terminal

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API – Cameron LNG LLC / Cameron Interstate Pipeline LLC

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marine berth would be used for creating the brackish marsh habitat. The created marsh habitat would vegetate naturally and the containment dikes utilized for the spoil disposal efforts will be breached following compaction and vegetative colonization to allow for fisheries access. The nature of these activities will be conducted in close coordination with the natural resource agencies and approximately one to three years after placement, or as otherwise directed. The agencies will be notified prior to commencement of these activities and will have the final authority as to the breach timing and locations. Cameron LNG will monitor the mitigation area for quality and functionality with monitoring reports submitted the first, third, fifth, and tenth year after placement as required by the mitigation plan and applicable permits to assure the project's success. One (1) 0.01 acre monitoring station will be established for every 10 acres of marsh created. Monitoring surveys will be conducted between the months of September and October, and the monitoring reports will be submitted in December of the same year. The monitoring reports will include digital images taken from ground level at each monitoring station and will consist of five sections as outlined in USACE Regulatory Guidance Letter no. 08-03, Dated October 10, 2008. Although an adaptive management plan was not required by the permitting agencies, Cameron LNG will work closely with the regulatory agencies to adapt the mitigation plan as needed throughout the life of the project.

API-14

February 2014

AP2 – Cameron LNG LLC / Cameron Interstate Pipeline LLC

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March 4, 2014

Ms. Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

**Re: Cameron LNG, LLC - Docket No. CP13-25-000
Comments on Draft Environmental Impact Statement**

On January 10, 2014, the Staff of FERC's Office of Energy Projects issued the draft environmental impact statement ("DEIS") for the Cameron Liquefaction Project. Cameron LNG, LLC ("Cameron LNG") is providing these additional comments on the DEIS¹ in light of the Commission's recent decision in *Sabine Pass Liquefaction, LLC*, 146 FERC ¶ 61,117 (2014). Specifically, Cameron LNG is requesting that the DEIS be clarified in minor respects, as set forth below, to reflect accurately the maximum productive capacity of the liquefaction trains that Cameron LNG will construct and operate. The environmental resource reports previously submitted by Cameron LNG in this docket already contain the information below, and Cameron LNG requests that the language in the DEIS reflect such information.

In its application, Cameron LNG described its proposed liquefaction facility as "consisting of three liquefaction trains with a total production capacity sufficient to produce 12 million metric tonnes per annum [mtpa] of LNG for export."² Application at 4 (italics added). This description indicated that the facilities would produce, at a minimum, 12 mtpa of LNG for loading onto a LNG tanker for export. The figure of 12 mtpa corresponds to the export authorizations that Cameron LNG has received from the U.S. Department of Energy, but is not an accurate statement of the actual maximum production capacity of the proposed liquefaction facilities. In *Sabine Pass*, the Commission indicated that the appropriate measure of liquefaction capacity to be set forth in a section 3 authorization is not a minimum, but rather "the maximum or peak capacity at optimal conditions as such a level represents the actual potential production of LNG." *Sabine Pass*, 146 FERC ¶ 61,117 at P 12.

As specified in Cameron LNG's application, the aggregate maximum liquefaction capacity of the proposed facilities under optimal conditions is 3,981 cubic meters per hour,

¹ Comments on the DEIS were originally due March 3, 2014. However, the Commission was closed on March 3 due to severe weather and therefore comments may be filed through March 4, 2014. See 18 C.F.R. § 385.2007(a)(2) (2013).

AP2-1

AP2-1: Comment acknowledged.

AP2-2

AP2-2: The relevant portions of the EIS have been revised to provide the required information on the maximum capacity of the Project.

AP2 – Cameron LNG LLC / Cameron Interstate Pipeline LLC

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Cameron LNG, LLC
Docket No. CP13-25-000
Page 2

which equates to approximately 14,954 mtpy or 40,970 metric tonnes per day (tpd). See Application, Exhibit F, Resource Report 13, Table 13.1-1 (Dec. 7, 2012). Each of the three trains can produce under such conditions approximately 4,985 mtpy or 13,657 tpd. Cameron LNG recognizes that it would need to seek authority from DOE to export LNG in excess of its current authorization.

AP2-2 (con't)

Consequently, Cameron LNG requests that on pages ES-2 and 1-2, the descriptions of the liquefaction capacity of a train be changed to the following: "each capable of producing under optimal conditions approximately 4,985 mtpy or 13,657 tpd of LNG."

Cameron also requests the following modification on page 1-2: "Cameron LNG anticipates an initial in-service date to liquefy natural gas (first liquefaction train) in the summer of 2017 for export of up to 4 mtpy of LNG. Cameron LNG expects to place the second and third liquefaction trains in service in early 2018 and the third liquefaction train is expected to be up to 12 mtpy in 2019."

AP2-3

AP2-3: The relevant portions of the EIS have been revised to provide the currently anticipated schedule for the Project as provided by the commenter.

These comments reflect the peak liquefaction capacity as set forth in Cameron LNG's application.

Respectfully submitted,

/s/ William D. Rapp

William D. Rapp
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San Diego, CA 92101
619-699-5050
wrapp@senpraglobal.com

Counsel for Cameron LNG, LLC

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CERTIFICATE OF SERVICE

Pursuant to Rule 2010 of the Federal Energy Regulatory Commission's Rules of Practice and Procedures, 18 C.F.R. § 385.2010 (2013), I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, D.C., this 4th day of March, 2014.

/s/ Pamela C. Tsang
Pamela C. Tsang
Morgan, Lewis & Bockius LLP
1111 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
Telephone: (202) 739-5199
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FG1 – U.S. Department of Fish and Wildlife

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ORIGINAL

United States Department of the Interior

FISH AND WILDLIFE SERVICE
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FEDERAL ENERGY
REGULATORY COMMISSION

February 14, 2014

Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE
Washington, DC 20426

CP11-25
0311-27

Subject: Draft Environmental Impact Statement (EIS) for the proposed Cameron Liquefaction Project by Cameron LNG, LLC (Cameron LNG) and Cameron Interstate Pipeline, LLC (Cameron Interstate) [collectively referred to as Cameron], Federal Energy Regulatory Commission (FERC) No. CP11-25-000 and CP27-000; Cameron, Calcasieu, and Beauregard Parishes, Louisiana

Dear Ms. Bose:

The U.S. Fish and Wildlife Service (Service) has reviewed the Federal Energy Regulatory Commission's (FERC) January 2014 Draft Environmental Impact Statement (EIS) for Cameron's proposed pipeline expansion and liquefaction project (terminal expansion). Proposed project activities consist of expanding the existing Cameron LNG import terminal and constructing 21 miles of new 42-inch diameter pipeline. Approximately 16 miles of that new pipeline would be within existing permanent Rights-of-Ways (ROW); the remaining 5 miles would be adjacent to existing pipeline/utility corridors, but outside existing permanent ROW. Cameron would also construct a 25-acre temporary contractor yard and a 30-acre compressor station to serve the new pipeline. The pipeline expansion project would require a total of approximately 368 acres for construction; 140 acres of that total has been previously disturbed during construction of the existing Cameron pipeline. The terminal expansion project would be constructed adjacent to and north of the existing Cameron LNG Terminal on approximately 430 acres, of which 50 acres is part of the existing terminal. The Service has reviewed the information provided and offers the following comments in accordance with provisions of the National Environmental Policy Act (NEPA) of 1969 (83 Stat. 852; 42 U.S.C. 4321 et seq.), the Endangered Species Act (ESA) of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.), and the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.).

FG1-1

FG1-1: Comment acknowledged.

Threatened and Endangered Species

In a letter dated October 16, 2012, the Service provided comments to Cameron's environmental consultant, T. Baker Smith, LLC, regarding the subject project's potential to impact Federal trust resources currently protected by the ESA. In response to our letter, T. Baker Smith, LLC conducted a red-cockaded woodpecker (RCW) survey for the proposed pipeline project area within Calcasieu and Beauregard Parishes, LA. Based on the results of that RCW survey, T. Baker Smith, acting as FERC's non-federal representative, requested the Service's concurrence with a not likely to adversely affect (NLAA) determination. Accordingly, the Service reviewed that RCW survey and in a letter dated March 11, 2013, we concurred with their NLAA determination. No further consultation, regarding threatened and endangered species, with our office will be necessary unless there are significant changes in the scope or location of the project.

FG1-2

FG1-2: Comment acknowledged. The text of the EIS has been revised to acknowledge this concurrence.

Migratory Birds

The Service continues to maintain the position that a Migratory Bird Conservation Plan be required as a condition of FERC's certification. Because Cameron Interstate filed that Plan on February 7, 2014, we recommend that the language on page 4-47 be re-drafted to reflect that the plan has been filed. Additionally, we recommend that the last paragraph on that page be revised to reflect that the Plan is part of FERC's determination, and that impacts to migratory birds would be ameliorated by the Plan. Therefore, the last paragraph should read:

FG1-3

FG1-3: Comment acknowledged. The text of the EIS has been revised as requested in section 4.1.6.3 and in summary sections as appropriate.

L-22

"Because Cameron Interstate has filed a Migratory Bird Conservation Plan and has agreed to conduct surveys and implement mitigation measures (such as timing of activities) to avoid impacts on migratory birds, we believe net adverse impacts on migratory birds would not be significant."

Wetlands

Terminal Expansion

The Draft EIS quantifies jurisdictional wetland impacts at 99.2 acres for the proposed terminal expansion; however, it appears that information may be outdated. According to a January 27, 2014, email from the U.S. Army Corps of Engineers, New Orleans District, (USACE NOD) the wetland delineation of the proposed terminal expansion area has been revised. Due to that USACE NOD revision, it appears the proposed terminal expansion would now impact 157 acres of jurisdictional wetlands. Therefore, FERC should consult with the USACE NOD to update project related jurisdictional wetland impact information for inclusion in the Final EIS. That information is necessary in order to ensure that project impacts to jurisdictional wetlands will be mitigated for at appropriate amounts. Page 4-30 of the Draft EIS, Compensatory Mitigation, states that Cameron proposes to offset the proposed jurisdictional wetland impacts at the terminal expansion project area via a permittee responsible mitigation project. That permittee responsible mitigation area would be located just west of the terminal expansion and adjacent to the existing marsh habitat previously created to offset impacts of Cameron's existing LNG Terminal, thus creating a larger area of contiguous intertidal marsh habitat.

FG1-4

FG1-4: The COE issued a Department of the Army permit for the Terminal Expansion after the draft EIS was published. The text of the EIS has been revised to present the revised wetland mitigation acreages.

FG1 – U.S. Department of Fish and Wildlife

10224-0012 FERC PDF (Unofficial) 02/24/2014

While the Service concurs with Cameron's permittee responsible mitigation proposal, in order for the Service to fulfill our compensatory mitigation responsibilities we recommend that the Final EIS include a mitigation plan. That permittee responsible mitigation plan should contain elevations of existing healthy intertidal marsh in the project area, initial and final target elevations of dredge material placement, a construction schedule outlining the timing of containment dike breaching, success criteria, monitoring/reporting provisions, and an adaptive management plan.

FG1-5

FG1-5: See response to comment FG1-4. Section 4.6.3.4 of the EIS has been revised to reflect the elevations and a construction schedule of the mitigation areas. More detailed information in the mitigation plan included in the Department of the Army permit issued to Cameron LNG and provided in Appendix K of the EIS.

Pipeline Expansion

Page 4-31 of the Draft EIS states that Cameron Interstate would impact approximately 62.1 acres of wetlands via the pipeline construction and associated facilities. However, wetland delineations were not completed between MP 2.8 to MP 4.7 along the pipeline route due to lack of access. Therefore, the Service supports FERC's recommendation that prior to construction Cameron Interstate should complete wetland delineations from MP 2.8 to MP 2.7.

FG1-6

FG1-6: Comment acknowledged. The recommendation regarding these surveys between MPs 2.8 and 4.7 is in the final EIS. If the Project is authorized this will be a condition of the FERC order authorizing the Project.

FG1-7

FG1-7: Comment acknowledged.

We appreciate the opportunity to provide comments on this proposed project. If you require further assistance regarding the information contained in this letter, please contact Joshua Marceaux (337/291-3110) of this office.

Sincerely,



Jeffrey D. Weller
Field Supervisor
Louisiana Ecological Services Office

cc: FWS, Atlanta, GA (ES/PP; Attn: Christine Willis)
USACE, Regulatory Functions Branch, New Orleans, LA (Attn: James Little)
NMFS, Baton Rouge, LA (Attn: Richard Hartman)
EPA, Dallas, TX
LDWF, Baton Rouge, LA (Attn: Kyle Balkum)
LDWF, Natural Heritage Program, Baton Rouge, LA
LDNR, Baton Rouge, LA

FG2 – U.S. Department of the Interior

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United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
1001 Indian School Road NW, Suite 348
Albuquerque, New Mexico 87104



ER 14/0014
File 9043.1

February 24, 2014

VIA ELECTRONIC MAIL ONLY

Kimberly D. Rose, Secretary
Federal Energy Regulatory Commission
888 First Street NE
Washington, DC 20426

Subject: COMMENTS; Draft Environmental Impact Statement (EIS) for the proposed Cameron Liquefaction Project by Cameron LNG, LLC (Cameron LNG) and Cameron Interstate Pipeline, LLC (Cameron Interstate) [collectively referred to as Cameron]; Federal Energy Regulatory Commission (FERC) No. CP11-25-000 and CP27-000; Cameron, Calcasieu, and Beauregard Parishes, Louisiana

Dear Ms. Bose:

The U.S. Fish and Wildlife Service (FWS) has reviewed the Federal Energy Regulatory Commission's (FERC) January 2014 Draft Environmental Impact Statement (EIS) for Cameron's proposed pipeline expansion and liquefaction project (terminal expansion). Proposed project activities consist of expanding the existing Cameron LNG import terminal and constructing 21 miles of new 42-inch diameter pipeline. Approximately 16 miles of that new pipeline would be within existing permanent Rights-of-Way (ROW); the remaining 5 miles would be adjacent to existing pipeline/utility corridors, but outside existing permanent ROW. Cameron would also construct a 25-acre temporary contractor yard and a 30-acre compressor station to serve the new pipeline. The pipeline expansion project would require a total of approximately 368 acres for construction; 140 acres of that total has been previously disturbed during construction of the existing Cameron pipeline. The terminal expansion project would be constructed adjacent to and north of the existing Cameron LNG Terminal on approximately 430 acres, of which 50 acres is part of the existing terminal. The FWS has reviewed the information provided and offers the following comments in accordance with provisions of the National Environmental Policy Act (NEPA) of 1969 (83 Stat. 852; 42 U.S.C. 4321 et seq.), the Endangered Species Act (ESA) of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.), and the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.).

FG2-1

FG2-1: See response to comment FG1-1 in comment letter FG1.

Threatened and Endangered Species

In a letter dated October 16, 2012, the FWS provided comments to Cameron's environmental consultant, T. Baker Smith, LLC, regarding the subject project's potential to impact Federal trust resources currently protected by the ESA. In response to our letter, T. Baker Smith, LLC conducted a red-cockaded woodpecker (RCW) survey for the proposed pipeline project area within Calcasieu and Beauregard Parishes, LA. Based on the results of that RCW survey, T. Baker Smith, acting as FERC's non-federal representative, requested the FWS's concurrence with a not likely to adversely affect (NLAA) determination. Accordingly, the FWS reviewed that RCW survey and in a letter dated March 11, 2013, we concurred with their NLAA determination. No further consultation, regarding threatened and endangered species, with the FWS Lafayette Field Office will be necessary unless there are significant changes in the scope or location of the project.

FG2-2

FG2-2: See response to comment FG1-2 in comment letter FG1.

Migratory Birds

The FWS continues to maintain the position that a Migratory Bird Conservation Plan be required as a condition of FERC's certification. Because Cameron Interstate filed that Plan on February 7, 2014, we recommend that the language on page 4-47 of the Draft EIS be re-drafted to reflect that the plan has been filed. Additionally, we recommend that the last paragraph on that page be revised to reflect that the Plan is part of FERC's determination; and that impacts to migratory birds would be ameliorated by the Plan. Therefore, the last paragraph should read:

"Because Cameron Interstate has filed a Migratory Bird Conservation Plan and has agreed to conduct surveys and implement mitigation measures (such as timing of activities) to avoid impacts on migratory birds, we believe net adverse impacts on migratory birds would not be significant."

FG2-3

FG2-3: See response to comment FG1-3 in comment letter FG1.

Wetlands

Terminal Expansion

The Draft EIS quantifies jurisdictional wetland impacts at 99.2 acres for the proposed terminal expansion; however, it appears that information may be outdated. According to a January 27, 2014, email from the U.S. Army Corps of Engineers, New Orleans District (USACE NOD), the wetland delineation of the proposed terminal expansion area has been revised. Due to that USACE NOD revision, it appears the proposed terminal expansion would now impact 157 acres of jurisdictional wetlands. Therefore, FERC should consult with the USACE NOD to update project related jurisdictional wetland impact information for inclusion in the Final EIS. That information is necessary in order to ensure that there will be mitigation in appropriate amounts for project impacts to jurisdictional wetlands. Page 4-30 of the Draft EIS, Compensatory

FG2-4

FG2-4: See response to comment FG1-4 in comment letter FG1.

FG2 – U.S. Department of the Interior

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Mitigation, states that Cameron proposes to offset the proposed jurisdictional wetland impacts at the terminal expansion project area via a permittee responsible mitigation project. That permittee responsible mitigation area would be located just west of the terminal expansion and adjacent to the existing marsh habitat previously created to offset impacts of Cameron's existing LNG Terminal, thus creating a larger area of contiguous intertidal marsh habitat.

FG2-4
(con't)

While the FWS concurs with Cameron's permittee responsible mitigation proposal, in order for the FWS to fulfill our compensatory mitigation responsibilities we recommend that the Final EIS include a mitigation plan. That permittee responsible mitigation plan should contain elevations of existing healthy intertidal marsh in the project area, initial and final target elevations of dredge material placement, a construction schedule outlining the timing of containment dike breaching, success criteria, monitoring/reporting provisions, and an adaptive management plan.

FG2-5

Pipeline Expansion

Page 4-31 of the Draft EIS states that Cameron Interstate would impact approximately 62.1 acres of wetlands via the pipeline construction and associated facilities. However, wetland delineations were not completed between MP 2.8 to MP 4.7 along the pipeline route due to lack of access. Therefore, the FWS supports FERC's recommendation that prior to construction Cameron Interstate should complete wetland delineations from MP 2.8 to MP 4.7.

FG2-6

We appreciate the opportunity to provide comments on this proposed project. If you require further assistance regarding the information contained in this letter, please contact Joshua Marceaux, FWS Lafayette Ecological Services Field Office at 337/291-3110 or at Joshua_Marceaux@fws.gov.

FG2-7

FG2-5: See response to comment FG1-5 in comment letter FG1.

FG2-6 : See response to comment FG1-6 in comment letter FG1.

FG2-7: Comment acknowledged.

Sincerely,



Stephen Spencer, Ph.D.
Regional Environmental Officer

cc: FERC Service List

FG2 – U.S. Department of the Interior

20140224-5090 FEREC PDF (Unofficial) 2/24/2014 12:03:16 PM

UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Cameron Liquefaction Project by Cameron LNG, LLC) Project Nos. CP11-25-000 and
(Cameron LNG) and Cameron Interstate Pipeline, LLC) CP27-000
(Cameron Interstate) [collectively referred to as Cameron])

Certificate of Service

I hereby certify that I have this day caused the foregoing document to be served upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated on this 24th day of February, 2014.



Stephen R. Spencer
Regional Environmental Officer
U.S. Department of the Interior
1001 Indian School Road NW, Ste. 348
Albuquerque, NM 87104

FG3 – National Marine Fisheries Service



UNITED STATES DEPARTMENT OF COMMERCE
NATIONAL OCEANIC AND ATMOSPHERIC ADMINISTRATION
NATIONAL MARINE FISHERIES SERVICE
Southeast Regional Office
263 13th Avenue South
St. Petersburg, Florida 33701

January 30, 2014 F/SER46:RH;jk
225/389-0508

Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E., Room 1A
Washington, D.C. 20426

Dear Secretary Bose:

NOAA's National Marine Fisheries Service (NMFS) has received the draft Environmental Impact Statement (EIS) for the Cameron Liquefaction Project (Docket No. CP13-25-000 and CP13-27-000) dated January 2013. Cameron LNG, LLC and Cameron Interstate Pipeline LLC propose to undertake activities necessary to construct the Cameron Liquefaction Project. Specific activities described in the draft EIS include construction of liquefied natural gas (LNG) and condensate storage tanks, a truck loading and unloading area, a marine work dock, 21 miles of 42-inch diameter pipeline, and a compressor station. All work is located in Cameron and Calcasieu Parishes, Louisiana.

As noted in the draft EIS, portions of the project are located in areas which have been identified as essential fish habitat (EFH) for various life stages of federally managed species, including postlarval and juvenile life stages of red drum, brown shrimp, and white shrimp. Those specific activities having the potential to impact EFH include the construction of the marine work dock, dredging in waterbottoms to access the dock, and fill placement in the mitigation area. Impacts related to the construction of the work dock and dredging adjacent to the dock have been adequately described and evaluated. However, based on our review of the draft EIS, details pertaining to the mitigation area are missing from the sections of the document pertaining to EFH or wetlands.

By email dated January 21, 2014, NMFS staff received details pertaining to the mitigation plan intended to compensate for impacts associated with the Cameron Liquefaction Project. Those details indicate it is the intent of Cameron LNG to fill 255 acres of shallow, tidally influenced water bottoms with dredged material to elevations suitable for marsh establishment. The NMFS supports the use of dredged material to create marsh elevations in tidally influenced areas. Unfortunately, no detailed information pertaining to the marsh creation component of the mitigation plan is provided in the draft EIS. The NMFS recommends the appropriate sections of the final EIS include all information pertaining to the mitigation plan, including elevations of healthy intertidal marsh in the project area, initial and final target elevations, a construction schedule to include breaching of containment dikes, success criteria, monitoring/reporting provisions, and an adaptive management plan.



FG3-1: The COE issued Cameron LNG a Department of the Army permit that includes a detailed mitigation plan approved by the COE. The permit is provided in Appendix K. We revised portions of section 4.6.3.4 to update Cameron LNG's proposed impacts and mitigation, including a summary of key information in the mitigation plan.

FG3-2: See response to FG3-1.

FG3-1

FG3-2

FG3 – National Marine Fisheries Service

In addition to the above, it appears information pertaining to project impacts on wetlands may be outdated. Various sections of the document quantify wetland impacts at 99 acres. However, the mitigation plan provided to us by Cameron LNG consultants quantifies impacts as 213 acres of jurisdictional wetlands. The final EIS should correctly quantify all wetland impacts at the appropriate locations in the document.

We appreciate your consideration of our comments. If you wish to discuss this project further or have questions concerning our recommendation, please contact Richard Hartman at (225) 389-0508 (ext 203).

FG3-3: The acreage of COE jurisdictional wetlands was initially determined to be 99 acres; however, the draft EIS also reflected the full 213.7 acres of wetland that would be filled (section 4.4.4). The COE has since revised its wetlands determinations and issued the Department of the Army permit. The final EIS has been revised to provide updated jurisdictional wetland impact and mitigation acreages.

Sincerely,



Virginia M. Fay
Assistant Regional Administrator
Habitat Conservation Division

FG3-4: Comment acknowledged.

- c: NOD Regulatory, J. Little
- FWS, Lafayette, Holland
- EPA, Dallas, Keeler
- LA DWF, Balkum
- LA DNR, Consistency, Haydel
- NOAA PPI, Nuneenkamp, Kokkinakis
- F/SER46, Swafford
- F/SER4, Dale, Rolles
- F/SER, Keys, Silverman
- Files

FG4 – U.S. Environmental Protection Agency



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

ORIGINAL
March 31, 2014
CP13-25
CP13-257

Kimberly D. Bose,
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

RE: Cameron LNG, LLC and Cameron Interstate Pipeline Draft Environmental Impact Statement (DEIS)

Dear Ms. Bose:

In accordance with our responsibilities under Section 309 of the Clean Air Act (CAA), the National Environmental Policy Act (NEPA), and the Council on Environmental Quality (CEQ) regulations for implementing NEPA, the U.S. Environmental Protection Agency (EPA) Region 6 office in Dallas, Texas, has completed its review of the Draft Environmental Impact Statement (DEIS) prepared by the Federal Energy Regulatory Commission (FERC) for the Cameron Liquefaction Project (Project), proposed by Cameron LNG, LLC and Cameron Interstate Pipeline, LLC (collectively Cameron). Cameron requests authorization to export 12 million tons of liquefied natural gas (LNG) per year from its terminal in Cameron and Calcasieu Parishes, Louisiana.

Based on our review, we have rated the DEIS as "Environmental Concerns - Insufficient Information" (EC-2); additional information on EPA's rating system can be found at <http://www.epa.gov/compliance/nea/comments/ratings.html>. We have enclosed detailed comments that identify our concerns and recommendations for additional analysis for the Final EIS (FEIS).

EPA appreciates the opportunity to review the DEIS. Please send our office one copy of the FEIS when it is filed using our *e-NEPA Electronic Filing System* at <http://www.epa.gov/compliance/nea/submitters/index.html>. Please note that a copy of this letter will be published on our website, <http://www.epa.gov/compliance/nea/pet/etd/etd.html>, in order to fulfill our responsibility under Section 309 of the CAA to inform the public of our views on the proposed Federal action. If you have any questions or concerns, please contact Rhonda Smith or Michael Jansky of my staff at (214) 665-8006 or (214) 665-7438 or via email at smith.rhonda@epa.gov or jansky.michael@epa.gov, respectively for assistance.

Sincerely,

Debra A. Griffin
Associate Director
Compliance Assurance and
Enforcement Division

SECRETARY OF THE
COMMISSION
2014 MAR 11 P 2:41
FEDERAL ENERGY
REGULATORY COMMISSION

Enclosure

FG4-1

FG4-1: This is FERC staff's response to the commenter's draft EIS comment letter. As a commenter, you are on our environmental mailing list and will receive a copy of this final EIS. When the Commission makes a decision on the project, it will be publicly available on FERC's eLibrary. We have provided responses below to the comments included in this comment letter.

**DETAILED COMMENTS
ON THE FEDERAL ENERGY REGULATORY COMMISSION
CAMERON LNG, LLC AND CAMERON INTERSTATE PIPELINE, LLC
DRAFT ENVIRONMENTAL IMPACT STATEMENT**

BACKGROUND

The Federal Energy Regulatory Commission (FERC) prepared this Draft Environmental Impact Statement (DEIS) to assess the environmental impacts associated with the construction of facilities proposed by Cameron LNG, LLC and Cameron Interstate Pipeline, LLC. This project is referred to as the Cameron Liquefaction Project (Project) and consists of the Cameron LNG Terminal Expansion (Terminal Expansion) and the Cameron Pipeline Expansion (Pipeline Expansion).

Cameron proposes to construct and operate onshore natural gas liquefaction and associated facilities to allow the export of liquefied natural gas (LNG), and to construct, own, operate, and maintain a new interstate natural gas pipeline, compressor station, and ancillary facilities in Louisiana.

PROPOSED ACTION

According to Cameron, the Project would transport and liquefy domestic natural gas into LNG for export, and deliver competitively-priced LNG to foreign markets. Cameron designed its project to meet each of the following purposes:

- enable bi-directional flow of natural gas along the Cameron Interstate Pipeline system and allow natural gas to be received from five pipeline interconnections;
- allow natural gas to be received by pipeline at the expanded LNG Terminal that would be treated, liquefied, stored, and loaded from LNG storage tanks into vessels berthed at the terminal's existing marine facility;
- preserve the import and re-gasification capabilities of the Cameron LNG Terminal; and
- preserve export capability of foreign-sourced LNG at the Cameron LNG Terminal.

Terminal Expansion

Cameron LNG would construct the Terminal Expansion on a 502-acre site between Louisiana State Highway 27 (LA-27) and the Calcasieu Ship Channel, about 2 miles north of the community of Hackberry, Louisiana. The proposed site is north of and partially within the existing terminal fence line in Cameron and Calcasieu Parishes, Louisiana. The Terminal Expansion would include the following key facilities:

- three separate systems that liquefy natural gas, each capable of producing 4 million metric tons per year of LNG for export;
- a 160,000-cubic-meter, full-containment LNG storage tank;
- refrigerant make-up and condensate product storage tanks;

- a truck loading/unloading area;
- a marine work dock for delivery of equipment and construction materials;
- utilities and associated systems; and
- minor modifications to existing terminal facilities.

Pipeline Expansion

Cameron proposes to construct and operate about 21 miles of 42-inch-diameter pipeline, a compressor station (Hobcock Compressor Station) totaling about 56,820 horsepower, and associated facilities in Cameron, Calcasieu, and Beauregard Parishes, Louisiana. The pipeline would extend from an existing Cameron Interstate Pipeline interconnection at the Florida Gas Transmission (FGT) pipeline to a new interconnection with Trunkline Gas Pipeline (Trunkline). Cameron would construct and operate a new interconnection with Trunkline; modify existing interconnections and metering facilities with the Transcontinental Gas Pipeline Corporation, Texas Eastern Transmission Company, FGT, and Tennessee Gas Pipeline systems; and construct and operate associated facilities, including metering facilities, pig receivers and launchers, and mainline valves.

COMMENTS

The following comments are offered for FERC’s consideration in preparation of the Final EIS (FEIS).

Environmental Justice

While EPA recognizes that FERC is not one of the agencies specified in Executive Order 12898 - Environmental Justice for Low Income and Minority Populations, we appreciate that it is FERC’s practice to address environmental justice in its NEPA documents. In this case, however, the DEIS does not provide any analysis to determine whether there are potentially affected low-income or minority populations, and consequently, there is no information provided to determine whether there may be disproportionate high and adverse human health or environmental effects on minority or low-income populations as result of the proposed action.

Recommendation:

EPA recommends that the Final EIS (FEIS) analyze the potential for environmental justice issues, using the methods outlined in the Council on Environmental Quality’s guidance (“Environmental Justice: Guidance under the National Environmental Policy Act,” December 1977), available at <http://energy.gov/nepa/downloads/environmental-justice-guidance-under-nepa>. The FEIS should determine whether minority and low-income populations are present that have the potential to be affected by the proposed project. As part of that analysis, for example, we recommend that the FEIS include a comparison of the demographics of the project area and suitable reference areas, like Cameron, Calcasieu and Beauregard Parishes. If potential environmental justice populations are identified, then the FEIS should determine whether there may be

FG4-2: Section 4.9 of the EIS addresses Environmental Justice, and we are providing additional information on Environmental Justice below. As noted in the EIS, the route of the Pipeline Expansion would be within or adjacent to existing pipeline and utility rights-of-way. Therefore, routing was not selected to disproportionately impact low income or minority populations. In addition, there are no towns or communities near the proposed route: the closest community is the city of Sulphur, about 2.3 miles from the route. Similarly, the proposed Terminal Expansion site is adjacent to the existing Cameron LNG Terminal and was not selected to disproportionately impact low income or minority populations. The residence closest to the Terminal Expansion site is about 1.2 miles to the northwest, and the nearest community is the town center of Hackberry, about 2.6 miles to the south. We are not aware of any reported Environmental Justice concerns for the existing pipelines or the existing terminal.

The ethnic makeup of Cameron, Calcasieu, and Beauregard Parishes is predominantly white (96.5, 71.5, and 82.2 percent, respectively, with “black or African American” the next highest at 1.9, 25.1, and 13.5 percent, respectively). Other ethnic groups (American Indian and Alaska native, native Hawaiian and other Pacific Islander, two or more races, and Hispanic or Latino origin) make up 4.7 percent of the population of Cameron Parish, 6.3 percent of the population of Calcasieu Parish, and 7.6 percent of the population of Beauregard Parish. The makeup of the state population is similar: 63.7 percent white, 32.4 black or African American, and the remaining ethnic groups 8.4 percent. Further the per capita income of the three parishes ranges from \$21,543 to 24,634, and the per capita income of the state is about \$23,094.

To ensure that information on the Project was available to residents in the vicinity of the proposed Project, we sent a Notice of Intent to prepare an environmental impact statement to federal, state, and local officials; agency representatives; conservation organizations; Native American tribes; local libraries and newspapers in the Project area; and property owners in the vicinity of planned Project facilities and held a public

FG4-2
(cont')

3

disproportionate high and adverse human health or environmental impacts on these populations, and measures to address those impacts should be considered.

Air Quality

PM₁₀ Emissions and Fugitive Dust Control

EPA believes it is especially important that mitigation measures include the use of best management practices for PM₁₀ and fugitive dust control (e.g., gravel roads, soil wetting practices, limiting access, traffic and speed reduction). In order to further reduce potential air quality impacts, the FEIS should include a detailed Construction Emissions Mitigation Plan or more fully discuss how the existing Fugitive Dust Control Plan for construction of the project is sufficient.

Section 4.11.1 – Air Quality, Pages 4-121 and 4-122:

This section states that once the construction phase is completed, the fugitive dust and emissions would subside and would be limited. Additionally, the section states that mitigation measures employed by Cameron LNG would meet all Louisiana Department of Environmental Quality (LDEQ) requirements for construction-related vehicle exhaust emissions. EPA recommends that, in addition to all applicable local, state, or federal requirements, the following mitigation measures be included (as applicable) in a construction emissions mitigation plan or similar document in order to reduce air quality impacts associated with emissions of NO_x, CO, CO₂, PM, SO₂, and other pollutants from construction-related activities:

The FEIS should more fully discuss specific actions including dust ordinances on the parish level, educational outreach tools, and tools to minimize the residents' exposure to PM₁₀ as applicable. In addition to measures included in the DEIS and all applicable local, state, or federal requirements, the EPA recommends that the following mitigation measures (as applicable) be included in the Plan in order to reduce impacts associated with emissions of PM, and other pollutants from any planned structural and non-structural activities, and possible future modifications to the roadway system:

Recommendations:

- Construction Emissions Mitigation Plan – The FEIS should include a draft Construction Emissions Mitigation Plan and ultimately adopt this plan in the Record of Decision. In addition to all applicable local, state, or federal requirements, we recommend the following control measures (Fugitive Dust, Mobile and Stationary Source and Administrative) be included (as applicable) in the Construction Emissions Mitigation Plan in order to reduce impacts associated with emissions of particulate matter and other pollutants from construction-related activities:
 - o Fugitive Dust Source Controls: The FEIS should identify the need for a Fugitive Dust Control Plan to reduce Particulate Matter 10 and Fine

FG4-2 (cont'): scoping meeting in Sulphur, Louisiana seeking input on the Project (see section 1.3.2). Notices were sent to about 300 interested parties. In addition, in March and August 2013 we mailed Project update brochures to ensure the public was up to date on the progress of the Project. We also notified the public that we were opening a comment period on the draft EIS and held a public comment meeting on the draft EIS in Sulphur. All public information is available on our e-library system. We did not receive any comments expressing concern about Environmental Justice impacts associated with the proposed Project and the Project would not significantly impact urban or residential areas.

As a result of these considerations, we conclude that there would not be disproportionately high and adverse human health or environmental effects on minority, low-income communities, or Native American tribes because none are present in the vicinity of the Project.

FG4-3

FG4-3: We believe that Cameron LNG's proposed mitigation measures identified in section 4.11.1.4, its adoption of the measures in our Upland, Erosion Control, Revegetation, and Maintenance Plan (Plan), and our traffic recommendation in section 4.9.6.1, provide sufficient mitigation for dust control to minimize the potential impacts of fugitive dust emissions during construction. In addition, in adopting our Plan (Plan), Cameron LNG would employ an Environmental Inspector for accountability and monitoring of environmental compliance during construction, including efficacy of the mitigation measures employed. Our analysis in section 4.2.5.1, also considered the wind erosion potential at the Cameron LNG Terminal site and the commensurate mitigation. We further note that speed limit signs are posted within the existing terminal, appropriately limiting vehicle speed, and would remain posted during construction. Lastly, we identify the nearest receptor to the Cameron LNG Terminal in section 4.11.2 and submit that construction would take place in areas where there are no residences or businesses near the construction site, and therefore it is unlikely that there would be sensitive receptors, such as those listed by the commenter, in the area near active construction areas.

Particulate Matter 2.5 emissions during construction and operations. We recommend that the plan include these general commitments:

- Stabilize heavily used unpaved construction roads with a non-toxic soil stabilizer or soil weighing agent that will not result in loss of vegetation, or increase other environmental impacts.
- During grading, use water, as necessary, on disturbed areas in construction sites to control visible plumes.
- Vehicle Speed
 - Limit speeds to 25 miles per hour on stabilized unpaved roads as long as such speeds do not create visible dust emissions.
 - Limit speeds to 10 miles per hour or less on unpaved areas within construction sites on un-stabilized (and unpaved) roads.
 - Post visible speed limit signs at construction site entrances.
- Inspect and wash construction equipment vehicle tires, as necessary, so they are free of dirt before entering paved roadways, if applicable.
- Provide gravel ramps of at least 20 feet in length at tire washing/cleaning stations, and ensure construction vehicles exit construction sites through treated entrance roadways, unless an alternative route has been approved by appropriate lead agencies, if applicable.
- Use sandbags or equivalent effective measures to prevent runoff to roadways in construction areas adjacent to paved roadways. Ensure consistency with the project's Storm Water Pollution Prevention Plan, if such a plan is required for the project.
- Sweep the first 500 feet of paved roads exiting construction sites, other unpaved roads en route from the construction site, or construction staging areas whenever dirt or runoff from construction activity is visible on paved roads, or at least twice daily (less during periods of precipitation).
- Stabilize disturbed soils (after active construction activities are completed) with a non-toxic soil stabilizer, soil weighting agent, or other approved soil stabilizing method.
- Cover or treat soil storage piles with appropriate dust suppressant compounds and disturbed areas that remain inactive for longer than 10 days. Provide vehicles (used to transport solid bulk material on public roadways and that have potential to cause visible emissions) with covers. Alternatively, sufficiently wet and load materials onto the trucks in a manner to provide at least one foot of freeboard.
- Use wind erosion control techniques (such as windbreaks, water, chemical dust suppressants, and/or vegetation) where soils are disturbed in construction, access and maintenance routes, and materials stock pile areas. Keep related windbreaks in place until the soil is stabilized or permanently covered with vegetation.

FG4-3
(cont)

- If practicable, lease new, clean equipment meeting the most stringent of applicable Federal¹ or State Standards. In general, commit to the best available emissions control technology. Tier 4 engines should be used for project construction equipment to the maximum extent feasible.
- Where Tier 4 engines are not available, use construction diesel engines with a rating of 50 hp or higher that meet, at a minimum, the Tier 3 Ignition Engines², unless such engines are not available.
- Where Tier 3 engine is not available for off road equipment larger than 100 hp, use a Tier 2 engine, or an engine equipped with retrofit controls to reduce
- exhaust emissions of nitrogen oxides and diesel particulate matter to no more than Tier 2 levels.
- Consider using electric vehicles, natural gas, biodiesel, or other alternative fuels during construction and operation phases to reduce the project's criteria and greenhouse gas emissions.
- Plan construction scheduling to minimize vehicle trips.
- Limit idling of heavy equipment to less than 5 minutes and verify through unscheduled inspections.
- Maintain and tune engines per manufacturer's specifications to perform at EPA certification levels, prevent tampering, and conduct unscheduled inspections to ensure these measures are followed.
- o Administrative controls:
 - Develop a construction traffic and parking management plan that maintains traffic flow and plan construction to minimize vehicle trips.
 - Identify any sensitive receptors in the project area, such as children, elderly, and the infirm, and specify the means by which impacts to these populations will be minimized (e.g. locate construction equipment and staging zones away from sensitive receptors and building air intakes).
 - Include provisions for monitoring fugitive dust in the fugitive dust control plan and initiate increased mitigation measures to abate any visible dust plumes.

Greenhouse Gas (GHG) Emissions

¹ EPA's website for nonroad mobile sources is <http://www.epa.gov/nonroad/>.

The DEIS provides information on the potential greenhouse gas emissions associated with the terminal and pipeline expansion. However, the DEIS does not provide an assessment of the lifecycle GHG emissions associated with the proposed action.

FG4-4

Recommendation:

We recommend that FERC establish reasonable spatial and temporal boundaries for the analysis of GHG emissions, and that the FEIS quantify and consider the lifecycle GHG emissions associated with the proposed action. The methodologies for conducting that analysis are available and well developed; FERC could draw on good examples of lifecycle GHG emissions done in NEPA analyses by other federal agencies.

Indirect Effects

In addition to considering the direct impacts of a proposed action, NEPA requires that agencies also consider indirect effects where there is a reasonably close causal relationship between the action and the environmental effect. With regard to LNG export terminals, we note that the Energy Information Administration's overall analysis of natural gas exports found that natural gas markets in the U.S. balance in response to increased natural gas exports largely through increased natural gas production (<http://energy.gov/te/services/natural-gas-regulation/lng-export-study>). However, the DEIS does not consider the potential for increased natural gas production as a result of the proposed export terminal, or the potential for environmental impacts associated with potential increases in natural gas production.

FG4-5

Recommendation:

We recommend the FEIS consider the extent to which implementation of the proposed project could increase the demand for domestic natural gas extraction, as well as potential environmental impacts associated with the potential increased production of natural gas.

Wetlands

Jurisdictional Wetlands

The DEIS states that 99.2 acres of wetlands on the site are jurisdictional under the Clean Water Act Section 404. However, a revised Jurisdictional Determination (JD) for the terminal site was issued by the U.S. Army Corps of Engineers New Orleans District on December 31, 2013. According to the revised JD, there are 335 acres of jurisdictional wetlands located on the property. Construction would impact approximately 213.5 acres of jurisdictional wetlands.

FG4-6

Recommendation:

The FEIS should be revised to accurately quantify the impacts to jurisdictional wetlands and waters of the U.S.

FG4-4: The EIS did indeed disclose the appropriate lifecycle GHG emission for the proposed action by quantifying the construction GHG emissions (including pre-construction activities, such as mobilization at the sites) as well as operational GHG emissions of the facilities, which considered maintenance activities during operation. We believe it to be presumptuous to present the operational GHG emissions for the entire "life" of the facilities because operation of the facilities is based on the international markets and economic viability. For this reason, the operational GHG emissions were presented on a yearly basis. With regard to GHG emissions associated with decommissioning the Project facilities, we state in section 2.8 that Cameron LNG and Cameron Interstate would need to comply with FERC's abandonment regulations, including environmental requirements in which we would evaluate the associated GHG emissions.

FG4-5: The commenter contends that the proposed Project and other planned LNG export projects, if constructed and operated, will cause an increase in environmental impacts from induced gas production and pipeline transportation. While it is reasonable to assume that export of natural gas could result in increased natural gas production, where this gas would come from is speculative and would likely change throughout the operation of the project. Further, the development of natural gas is not the subject of this EIS nor is the issue directly related to the proposed Project. Production and gathering activities, and the pipelines and facilities used for these activities, are not regulated by FERC, but are overseen by the affected region's state and local agencies with jurisdiction over the management and extraction of the resource. Determining the well and gathering line locations and the environmental impacts associated with their development and operation is not feasible as the market and gas availability at any given time would determine the source of the natural gas.

As part of its NEPA analysis of proposed projects, the FERC often considers the potential environmental impacts of natural gas production and development occurring in the project area as part of the cumulative impacts analysis to the extent that there is meaningful information available to assist the FERC's decision-making process in a particular proceeding (as indicated in our cumulative impacts discussion [section 4.13]). With respect to production and development activities that are not within a project area, the FERC determines whether such activities should be included in the EA or EIS based upon a fact-specific analysis.

FG4-5 (cont): CEQ regulations require agencies to consider environmental effects of proposed actions, including direct and indirect effects, if these effects are “reasonably foreseeable.” Where appropriate, the FERC evaluates the specific facts to determine whether natural gas production and development is a “reasonably foreseeable” direct or indirect result of construction and operation of the project under consideration, or whether such activities are too speculative or attenuated to warrant inclusion in the EA or EIS.

In this case, the environmental impacts from induced production and pipeline transportation which may result from additional gas development are not “reasonably foreseeable” and such additional development, or any correlative potential impact, is not an “effect” of the Cameron Liquefaction Project for purposes of a cumulative impacts analysis. No specific gas play has been identified as a source of natural gas and the proposed Project does not depend on additional gas production, which may occur for reasons unrelated to the Project and over which the Commission has no control, such as state permitting for additional gas wells.

Therefore, induced gas production and pipeline transportation and the impacts associated with gas production and transportation, other than the impacts associated with the proposed Pipeline Expansion, are outside of the scope of this EIS.

FG4-6: Section 4.4 of the draft EIS correctly depicted the acres of wetland that the Project would impact during construction. The only area that has significantly changed is the acreage of mitigation for those impacts, as the COE is now taking jurisdiction of many additional wetland acreages. The EIS has been revised to provide the current acreages of impact and mitigation. The COE issued a Department of the Army (DA) permit (Section 404 and Section 10 permits) for the Terminal Expansion after the draft EIS was prepared. The mitigation plan proposed by Cameron was reviewed and approved by the COE and is included in the DA permit.

Compensatory Mitigation for Wetland Impacts

Cameron LNG has proposed to mitigate for impacts to wetlands by using dredged material generated by construction of the work dock and maintenance dredging at the existing terminal berthing area to fill shallow open water and create tidal emergent marsh habitat. The DEIS states that approximately 129 acres of open water would be converted to marsh habitat as compensatory mitigation for 99.2 acres of wetland impacts.

Recommendations:

The FEIS should include a mitigation plan for all impacts to jurisdictional wetlands.

EPA requests that the FEIS include a map that identifies proposed mitigation areas, and cross-sections and target elevations for the created tidal marsh based on adjacent healthy reference marsh.

The FEIS should include a mitigation work plan and construction schedule, performance standards, monitoring and reporting plan, long-term and adaptive management plans, and long-term protection measures and financial assurances for this project.

EPA suggests that a wetland functional assessment be performed for both the impact and mitigation sites to determine that the proposed project would not result in a net loss of wetland functions in the project watershed.

EPA suggests that mitigation be conducted prior to or concurrently with the project impacts to reduce temporal loss of wetland functions.

FG4-7

FG4-7: See response to comment FG4-6. In addition, the DA permit (Section 404 and Section 10 permits) issued to Cameron LNG by the COE on February 12, 2014 includes the mitigation plan, which provides the majority of the information requested by the commenter. The mitigation plan does not include financial assurances. We revised the EIS to include the DA permit as Appendix K. We also revised section 4.6.6.2 of the EIS to present key information regarding the mitigation plan.